



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

FJN/GK/TBM  
F. #2014R01920/OCDETF #NY-NYE-764

*271 Cadman Plaza East  
Brooklyn, New York 11201*

June 1, 2022

By ECF

The Honorable Dora L. Irizarry  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Dairo Antonio Usuga David  
Criminal Docket No. 14-625 (S-4) (DLI)

Dear Judge Irizarry:

The government respectfully writes to request that a proposed stipulation and protective order concerning discovery materials be so ordered by the Court. The government makes this application because there are discovery materials to be produced to the defendant that contain sensitive information, and the government believes that the proposed stipulation will enable expedited production of those materials. The proposed stipulation and order, which has been signed by all parties, is respectfully enclosed for the Court's consideration.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/ Francisco J. Navarro  
Francisco J. Navarro  
Gillian A. Kassner  
Tara B. McGrath  
Assistant United States Attorneys  
(718) 254-7000

cc: Clerk of Court (DLI) (By ECF)  
Arturo Hernandez, Esq. (By ECF)  
Alexei Schacht, Esq. (By ECF)